

THE STATE OF NEW HAMPSHIRE
SUPERIOR COURT

HILLSBOROUGH, SS.
Northern District

OCTOBER TERM

THE STATE OF NEW HAMPSHIRE

v.

ADAM MONTGOMERY

Case No. 216-2022-CR-02372

STATE'S ASSENTED TO STRUCTURING PROPOSAL

NOW COMES the State of New Hampshire, by and through its attorneys, the Office of the Attorney General, and respectfully submits the following proposal for dates and deadlines for trial and pretrial matters in the above-captioned case.

Counsel for the defendant has seen the schedule below and assented to it.

The structuring proposal only sets deadlines for listed events, and the parties will endeavor to file any applicable pleadings prior thereto.

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|----|---|------------------------|
| 1. | Jury selection: | February 6, 2024 |
| 2. | Final Pretrial Conference | January 16, 2024 |
| 1. | State to provide Discovery: | Completed ¹ |
| 2. | State expert disclosure/CVs/reports: | Completed ² |
| 3. | Notice of defenses | November 27, 2023 |
| 4. | Defense expert disclosure/CVs/ reports: | November 27, 2023 |

¹ The State will provide additional Discovery forthwith to the defense to the extent that any is generated during the pendency of this matter.

² The State has disclosed all expert reports and provided a notice of the experts it anticipates calling at trial. The State has requested all expert CVs and will disclose them as they are received.

Approved and So Ordered



Honorable Amy B. Messer
November 1, 2023

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|-----|---|--------------------------------|
| 5. | Major and dispositive motions, such as motions to suppress and motions to dismiss | December 13, 2023 ³ |
| 6. | Rebuttal expert disclosure/CVs/reports: | January 5, 2024 |
| 7. | Any <i>motions in limine</i> to exclude/admit evidence under Rule 404(b) | December 22, 2023 |
| 8. | Other <i>motions in limine</i> | January 5, 2024 |
| 9. | Completion by both sides of depositions of expert/lay witnesses: | January 12, 2024 |
| 10. | State's anticipated trial witness list: | December 27, 2023 |
| 11. | Defendant's anticipated trial witness list with reciprocal discovery: | January 5, 2024 |
| 12. | Proposed jury instructions: | February 6, 2024 |

³ The parties to provide witness lists 7 days before any scheduled evidentiary hearing on such motions.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: October 31, 2023

/s/ Benjamin J. Agati
Benjamin J. Agati, Bar # 16161
Senior Assistant Attorney General

/s/ R. Christopher Knowles
R. Christopher Knowles, Bar #276524
Assistant Attorney General

Criminal Justice Bureau
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Concord, NH 03301-6397

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via the State of New Hampshire e-filing system to Carrie Smith and Jamie Brooks, Esqs., counsel of record in this matter.

/s/ R. Christopher Knowles
R. Christopher Knowles